Evan J. Smith

From: September Wynne (Legal) [SWYNNE@bordersgroupinc.com]

Sent: Friday, April 27, 2007 9:10 AM

To: Evan J. Smith

Cc: Ldrurylaw@aol.com; Andolina, Michael C.; Blocker, Mark B.; dmeyer@mwe.com; asteinecke@randomhouse.com

Subject: RE: A Million Little Pieces Class Action Litigation

Evan:

Just a quick follow up to the letter I sent, I had asked IT to do some preliminary analysis on the *Million Little Pieces* purchases, and they just finished that process.

Based on some preliminary analysis, they estimate about 45% of purchases were made via credit card (AND, confirmed that we would have to request contact info from the credit card companies). The remaining estimated 55% of purchases would be untraceable to a distinct customer.

They've estimated between 250 and 300 hours to pull the data and associate credit card information through our systems. When you factor in the IT salaries of (on average) between $20-$30/hour that could potentially cost upwards of $10,000, just for the analysis.

September Wynne, ARM
Risk Manager & Associate General Counsel

Borders Group, Inc.
100 Phoenix Drive
Ann Arbor, Michigan 48108
swynne@bordersgroupinc.com
Phone: 734-477-4127 Fax: 734-477-1370

-----Original Message-----
From: September Wynne (Legal)
Sent: Wednesday, April 25, 2007 2:49 PM
To: 'Evan J. Smith'
Cc: Ldrurylaw@aol.com; 'Andolina, Michael C.'; 'Blocker, Mark B.'; dmeyer@mwe.com; 'asteinecke@randomhouse.com'
Subject: RE: A Million Little Pieces Class Action Litigation

Evan - attached please find Borders response to your inquiries. Apologize for the delay. Please let me know if you have any further questions.

September Wynne, ARM
Risk Manager & Associate General Counsel

Borders Group, Inc.
100 Phoenix Drive
Ann Arbor, Michigan 48108

swynne@bordersgroupinc.com
Phone: 734-477-4127 Fax: 734-477-1370

-----Original Message-----
From: Evan J. Smith [mailto:esmith@brodsky-smith.com]
Sent: Thursday, April 12, 2007 6:12 PM
To: September Wynne (Legal)
Cc: Ldrurylaw@aol.com; 'Andolina, Michael C.'; 'Blocker, Mark B.'; dmeyer@mwe.com
Subject: A Million Little Pieces Class Action Litigation

Dear September,

Please see attached correspondence. Thank you for your attention.

Evan Smith

Evan J. Smith, Esquire
Brodsky & Smith, LLC
Two Bala Plaza, Suite 602
Bala Cynwyd, PA 19004
610.667.6200
610.667.9029 (fax)
www.brodsky-smith.com